

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TINA MICHELLE BRAUNSTEIN,

Plaintiff,

-against-

SAHARA PLAZA, LLC and THE PLAZA
HOTEL, a FAIRMONT MANAGED HOTEL,

Defendants.

Civil Case No. 1:16-cv-08879 (VSB)

(Electronically Filed Document)

**NOTICE OF MOTION
FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the Declaration of David I. Rosen, Esq. and the exhibits annexed thereto, the Affidavit of Karen Wenger and the exhibits annexed thereto, Defendants' Local Civil Rule 56.1 Statement of Undisputed Facts, the accompanying Memorandum of Law, and all of the pleadings and proceedings heretofore had herein, Defendants will move this Court, before the Hon. Vernon S. Broderick, at the United States District Courthouse located at 40 Foley Square, Rm. 518, New York, NY, on such date and at such time as the Court may designate, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in Defendants' favor and dismissing the complaint in the above-captioned action with prejudice, because there are no material issues of fact in dispute, and Defendants are entitled to judgment as a matter of law, and further, granting to Defendants' their costs, including attorneys' fees, and such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated February 14, 2018, Plaintiff must file her opposition to the motion, if any, on or before May 4, 2018.

Dated: New York, New York
March 14, 2018

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LLC and Fairmont Hotels & Resorts
(Maryland) LLC*

By: 

DAVID I. ROSEN, ESQ.